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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
MEDFORD DIVISION**

RALPH MARK NEWTON, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 1:22-cv-00150-CL

**DEFENDANTS' CONSENT  
MOTION FOR AN  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

**CERTIFICATE OF COMPLIANCE WITH L.R. 7-1**

Undersigned counsel certifies that he conferred by telephone with Plaintiffs' counsel regarding this motion, and Plaintiffs consent to Defendants' request.

**MOTION**

Defendants respectfully move for a three-week extension of time to file their response to Plaintiffs' complaint, ECF No. 1. The current deadline to respond is April 4, 2022. *See* Fed. R. Civ. P. 12(a)(2).

Defendants' Consent Motion for an Extension of Time to Respond to Complaint  
Case No. 1:22-cv-00150-CL

Plaintiffs commenced this action on January 27, 2022, alleging, *inter alia*, that the Federal Bureau of Investigation has “denied” Plaintiff Ralph Mark Newton the ability to purchase a firearm because his criminal history contains multiple criminal convictions that could potentially prohibit him from possessing a firearm under federal law. *See generally* ECF No. 1. Plaintiffs served the United States Attorney’s Office for the District of Oregon with a summons and a copy of the complaint on February 3, 2022.

The parties have recently been engaged in discussions to determine whether any issues in this litigation can be resolved without the need for judicial intervention. Defendants respectfully suggest that these discussions may allow the parties to narrow the issues that are in dispute, if not lead to an informal resolution of this lawsuit. Accordingly, to allow these discussions to continue, Defendants request that the Court extend their deadline to respond to Plaintiffs’ complaint by three weeks, such that any responsive pleading will be due on or before April 25, 2022.

This motion is made in good faith and not for purposes of delay. The proposed extension will not impact any other existing deadlines or schedules imposed by the Court.

Dated: March 28, 2022

Respectfully Submitted,

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